

EXHIBIT 6

From: [Babchinetskaya, Izabella \(Phila\)](#)

Sent: Wednesday, September 7, 2022 7:09:00 PM

To: [Powell, Courtney](#)

Cc: [Holkum, Laura](#); aago@lawyerscommittee.org; [Tianna Mays](#); [Jonathan Irwin](#); [Leckerman, Jason \(Phila\)](#); [Woody Glass](#); [Swaminathan, Lisa B. \(Phila\)](#); [Gavin, Laura \(Phila\)](#)

Subject: RE: Hill et al. v. Town of Valley Brook

Sensitivity: Normal

Courtney,

We received Defendants' production of 122 pages late last night. As an initial matter, the production does not comply with the ESI protocol the parties met-and-conferred about on July 28, 2022. Defendants produced a single PDF, which is not Relativity-compatible, and does not appear to include metadata. Kindly reproduce the documents in the agreed upon format by September 9, 2022.

In addition, based on Defendants' written responses and your oral representations that you anticipated producing around 1,000 pages at our meet-and-confer held on August 19, 2022, please confirm that the 122 pages is not a complete production and that Defendants will be producing the remaining documents by the end of this week. Finally, we sent you a draft protective order on August 25, 2022, and we have yet to receive any response to the protective order.

Thanks,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Tuesday, September 6, 2022 10:43 PM

To: Babchinetskaya, Izabella (Phila) <Babchinetskaya@ballardspahr.com>; aago@lawyerscommittee.org; [Tianna Mays](#) <tmays@lawyerscommittee.org>; [Jonathan Irwin](#) <Jonathan@wardglasslaw.com>; [Leckerman, Jason \(Phila\)](#) <LeckermanJ@ballardspahr.com>; [Woody Glass](#) <woody@wardglasslaw.com>; [Swaminathan, Lisa B. \(Phila\)](#) <SwaminathanL@ballardspahr.com>; [Gavin, Laura \(Phila\)](#) <gavinl@ballardspahr.com>

Cc: [Holkum, Laura](#) <lholkum@spencerfane.com>

Subject: Hill et al. v. Town of Valley Brook

⚠ EXTERNAL

Please see the below link:

<https://spencerfane.sharefile.com/d-s2928236061b94ca7be1176f22540a54e>

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